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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

Richard and Lorraine Kuhn

Case No.: 17-31259

Judge: Michael B. Kaplan

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Specialized Loan Servicing,  
creditor,

A hearing has been scheduled for December 9, 2020, at 9:00am.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

The Debtor lost his job during the Covid-19 pandemic. He recently started a new job. We will be able to provide a payment of \$700.00 to our attorney for SLS on December 4, 2020. We would ask that the remaining balance be added to our Chapter 13 Plan. The co-Debtor has a wage order for the monthly Trustee payments. We will need to file a modified Plan to extend the length of the

☒ Other (**explain your answer**):

Plan to 48 months so that we can continue to make our Trustee payment and cure the post-petition arrears. We will be able to resume our mortgage payments to SLS starting January 2021.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 12/1/2020

/s/ Richard Kuhn  
Debtor's Signature

Date: 12/1/2020

/s/ Lorraine Kuhn  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.